

1 MARK J. CONNOT (10010)
2 KEVIN M. SUTEHALL (9437)
3 LUCY C. CROW (15203)
4 **FOX ROTHSCHILD LLP**
5 1980 Festival Plaza Drive, #700
6 Las Vegas, Nevada 89135
7 (702) 262-6899 tel
8 (702) 597-5503 fax
9 mconnot@foxrothschild.com
10 ksutehall@foxrothschild.com
11 lcrow@foxrothschild.com
12 *Attorneys for Defendant Telecheck*

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 CHARLENE TIBBS,

11 Plaintiff,

12 v.

13 CAPITAL ONE; EARLY WARNING;
14 TELECHECK; AND WELLS FARGO,

15 Defendants.

Case No.: 2:20-cv-00147-APG-VCF

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO RESPOND TO
COMPLAINT (SECOND REQUEST)**

16 **IT IS HEREBY STIPULATED AND AGREED BY AND BETWEEN** Plaintiff

17 Charlene Tibbs (“Plaintiff”) and Defendant Telecheck Services, Inc., sued as “Telecheck”
18 (“Telecheck”) (together the “Parties”), by and through their undersigned counsel, as follows:

19 On January 22, 2020, Plaintiff filed a Complaint (the “Complaint”) in the above-entitled
20 Court. (ECF No. 1)

21 On April 16, 2020, the Court entered an Order extending the deadline for Telecheck to
22 respond to the Complaint to April 29, 2020. (ECF No. 14)

23 The Parties have agreed to further extend the deadline for Telecheck to respond to the
24 Complaint by an additional 14 days to allow the Parties to explore settlement. This request is not
25 intended to cause delay or prejudice any party.

26 //

27 //

28 //

1 **NOW, THEREFORE, IT IS STIPULATED AND AGREED** by and between the
2 Parties that the time for Telecheck to respond to the Complaint is extended to May 13, 2020.

3
4 DATED this 27th day of April, 2020

DATED this 27th day of April, 2020

5 **FOX ROTHSCHILD LLP**

KNEPPER & CLARK LLC

6 /s/ Kevin M. Sutehall

/s/ Miles N. Clark

7 MARK J. CONNOT (10010)
8 KEVIN M. SUTEHALL (9437)
9 LUCY C. CROW (15203)
10 1980 Festival Plaza Drive, #700
11 Las Vegas, Nevada 89135
12 (702) 262-6899 tel
(702) 597-5503 fax
mconnot@foxrothschild.com
ksutehall@foxrothschild.com
lcrow@foxrothschild.com
Attorneys for Defendant Telecheck

MATTHEW I. KNEPPER (12796)
MILES N. CLARK (13848)
5510 S. Fort Apache Rd., Ste. 30
Las Vegas, Nevada 89148-7700
(702) 856-7430 tel
(702) 447-8048 fax
matthew.knepper@knepperclark.com
miles.clark@knepperclark.com
HAINES & KRIEGER, LLC
DAVID H. KRIEGER (9086)
8985 S. Eastern Ave., Ste. 350
Henderson, Nevada 89123
(702) 880-5554 tel
(702) 385-5518 fax
dkrieger@hainesandkrieger.com
Attorneys for Plaintiff

13
14
15
16
17
18
19 **IT IS SO ORDERED**

20 
21 **UNITED STATES MAGISTRATE JUDGE**

22 4-28-2020

23 **DATED:** _____
24
25
26
27
28